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April 4, 2025

**VIA CM/ ECF**

Honorable Michael A. Hammer  
United States District Court District of New Jersey  
Martin Luther King Building & U.S. Courthouse  
50 Walnut Street, Rm. 2C  
Newark, NJ 07102

**Re: *In re Tingo Group, Inc. Derivative Litigation*, 2:23-cv-20749-ES-MAH  
Request for Adjournment Under Local Rule 7.1**

Dear Magistrate Judge Hammer:

This law firm, together with The Brown Law Firm P.C., are co-lead counsel for plaintiffs in the above captioned shareholder derivative action brought on behalf of plaintiff Tingo Group, Inc. (“Tingo” or the “Company”). Currently pending before the Court is Defendants Robert Benton, John Brown and Darren Mercer (collectively, “Defendants”) Motion to Dismiss the Verified Consolidated Shareholder Derivative Complaint.

Per stipulation and order, the motion to dismiss opposition deadline is currently scheduled for April 8, 2025 [ECF No. 74]. Pursuant to Local Rule 7.1(d)(5), co-lead counsel for the consolidate shareholder derivative action hereby request that Defendants’ motion be adjourned.

The new motion day would then be May 5, 2025. This will give the parties the time needed to explore an alternative approach to motion practice.

Thank you for the Court’s attention to this matter.

Respectfully submitted,

/s/ Lee Squitieri  
Lee Squitieri